

David Krieger, Esq.  
Nevada Bar No. 9086  
HAINES & KRIEGER, LLC  
8985 S. Eastern Avenue, Suite 350  
Henderson, Nevada 89123  
Tel: (702) 880-5554  
Fax: (702) 385-5518  
[dkrieger@hainesandkrieger.com](mailto:dkrieger@hainesandkrieger.com)

*Attorneys for Plaintiff*  
Kimberly M. Brown

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Kimberly M. Brown,

Plaintiff,

v.

BANK OF AMERICA, NATIONAL  
ASSOCIATION, OCWEN LOAN  
SERVICING, LLC, WEST ASSET  
MANAGEMENT, INC., WELLS  
FARGO FINANCIAL, EXPERIAN  
INFORMATION SOLUTIONS, INC.,

Defendants.

Case No.: **2:15-cv-02185-APG-VCF**

**STIPULATION AND ORDER TO  
AMEND THE COMPLAINT**

**(First Request)**

**STIPULATION AND ORDER TO AMEND COMPLAINT**

Plaintiff Kimberly M. Brown and Defendants WELLS FARGO  
FINANCIAL NATIONAL BANK (WELLS FARGO), EXPERIAN  
INFORMATION SOLUTIONS, INC. (EXPERIAN), BANK OF AMERICA,  
NATIONAL ASSOCIATION (BOA) and OCWEN LOAN SERVICING, LLC  
(Ocwen) (collectively the “Parties”) respectfully submit the following Stipulation

1 permitting the Plaintiffs to file a first amended complaint (hereinafter "FAC",  
2 attached hereto as **Exhibit "1"**).

3  
4 The FAC clarifies the claims and allegations against the remaining  
5 Defendants and this FAC in being filed to expedite resolution in these matters.

6 **IT IS SO STIPULATED.**

7  
8 Dated February 9, 2016.

9 /s/ David Krieger, Esq

10 David Krieger, Esq.  
11 Haines & Krieger, LLC  
*Attorneys for Plaintiff*

12 /s/ Dana J. Nitz

13 Dana J. Nitz  
14 Wright, Finlay & Zak, LLP  
*Attorneys for Defendant Ocwen*

15 /s/ Matthew Knepper, Esq.

16 Matthew Knepper, Esq.  
17 Akerman, LLP  
*Attorneys for Defendant Bank of America*

Dated February 9, 2016.

9 /s/ Tanya N. Peters, Esq.

10 Tanya N. Peters, Esq.  
11 Snell & Wilmer, LLP  
*Attorneys for Defendant Wells Fargo*

12 /s/ Jennifer L. Braster, Esq.

13 Jennifer L. Braster, Esq.  
14 Maupin Naylor Braster  
*Attorneys for Defendant Experian*

18 **ORDER**

19  
20 IT IS SO ORDERED that this Stipulation and Order to Amend the  
21 Complaint is hereby **GRANTED**.

22  
23 IT IS FURTHER ORDERED, that the Plaintiff shall file the FAC within  
24 seven (7) of entry of this Order.

25   
26 \_\_\_\_\_  
27 U.S. DISTRICT COURT JUDGE

28 DATED: February 9, 2016